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10 Attorneys for Defendant
11 DISCOVER FINANCIAL SERVICES

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WALTER BRADLEY, on behalf of himself and all others similarly situated, Case No. 3:11-cv-05746-NC
Plaintiff,) [Assigned to the Hon. Nathanael Cousins]
vs.) **STIPULATION AND [PROPOSED]**
DISCOVER FINANCIAL SERVICES,) **ORDER EXTENDING TIME TO**
Defendant.) **RESPOND TO CLASS ACTION**
) **COMPLAINT**

STIPULATION

WHEREAS, on November 30, 2011, plaintiff Walter Bradley (“Plaintiff”) filed a Complaint in this Court;

WHEREAS, on December 19, 2011, defendant Discover Financial Services (“Defendant”) executed a Waiver of the Service of Summons, which was filed with this Court on December 22, 2011;

WHEREAS, Defendant's response to the Complaint currently is due on or before February 7, 2012;

WHEREAS, the parties have agreed to a brief extension of the time for Defendant to answer or otherwise respond to the Complaint;

WHEREAS, pursuant to Local Rule 6-1(a), parties may agree to an extension of time within which to answer or otherwise respond to a complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, the extension proposed herein will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, no previous extensions have been requested; and

WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall respond to the Complaint no later than February 21, 2012.

IT IS SO STIPULATED.

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2 Dated: January 23, 2012

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
LISA M. SIMONETTI
JASON S. YOO

6 By: /s/ Lisa M. Simonetti
Lisa M. Simonetti

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8 Attorneys for Defendant
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10 DISCOVER FINANCIAL SERVICES

Dated: January 23, 2012

10 ANKCORN LAW FIRM, PC
11 MARK ANKCORN

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13 By: /s/ Mark Ankcorn
14 Mark Ankcorn

15 Attorneys for Plaintiff
16 WALTER BRADLEY

17 **[PROPOSED] ORDER**

18 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

19
20 Dated: January 23, 2012

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HON. NATHANAEL COUSINS

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2012, a copy of the foregoing

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO
CLASS ACTION COMPLAINT** was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of electronic Filing. Parties may access this filing through the court's EM/ECF System.

/s/ Lisa M. Simonetti
Lisa M. Simonetti

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